EPA/ROD/R03-88/850
1988

# EPA Superfund
# Record of Decision:

## RHINEHART TIRE FIRE DUMP
## EPA ID: VAD980831796
## OU 01
## FREDERICK COUNTY, VA
## 06/30/1988

| ALTERNATIVE NO. | ALTERNATIVE |
|---|---|
| 1 | NO ACTION |
| 2 | SOIL EROSION CONTROLS<br>INCREASE FREEBOARD ON<br>DUTCHMAN'S & RHINEHART'S PONDS<br>COLLECTION OF SURFACE WATER<br>RUNOFF, GRAVITY SETTLING<br>COLLECTION OF SHALLOW GROUND<br>WATER OILY SEEPS: OIL-WATER<br>SEPARATION METALS REMOVAL |
| 3 | SOIL EROSION CONTROLS<br><br>INCREASED FREEBOARD ON<br>DUTCHMAN'S & RHINEHART'S PONDS<br>COLLECTION OF SURFACE WATER<br>RUNOFF, GRAVITY SETTLING<br>COLLECTION OF SHALLOW GROUND<br>WATER OILY SEEPS: OIL-WATER<br>SEPARATION TRUCK WATER TO POTW |
| 4 | SOIL EROSION CONTROLS PLUS<br>HYDROSEEDING<br><br>INCREASE FREEBOARD ON<br>DUTCHMAN'S AND RHINEHART'S PONDS<br>COLLECTION OF SURFACE WATER<br>RUNOFF, GRAVITY SETTLING<br>COLLECTION OF SHALLOW<br>GROUND WATER OILY SEEPS:<br>OIL- WATER SEPARATION METALS<br>REMOVAL |

A BRIEF DESCRIPTION OF EACH ALTERNATIVE FOLLOWS:

ALTERNATIVE 1 - NO ACTION

UNDER THIS ALTERNATIVE, NO MEASURES WILL BE TAKEN TO PREVENT MIGRATION OF CONTAMINATION OFFSITE. A QUARTERLY SAMPLING AND ANALYSIS OF SURFACE WATER WILL BE IMPLEMENTED TO MONITOR OFFSITE CONDITIONS IN THE UNNAMED TRIBUTARY AND HOGUE CREEK AND ON-SITE IN MASSEY RUN. FILTERED AND UNFILTERED SAMPLES WILL BE ANALYZED FOR ZINC, COPPER, LEAD, SILVER, BARIUM, MANGANESE AND ARSENIC.

ALTERNATIVES 2,3, AND 4

GENERAL

THE GOAL OF IMPLEMENTING ALTERNATIVE 2,3, AND 4 IS TO MINIMIZE THE AMOUNT OF CONTAMINATION LEAVING THE SITE VIA SURFACE WATER. KEY ISSUES INVOLVED WITH REDUCTION OF MIGRATION OF CONTAMINATION ARE MINIMIZATIONS OF SOIL EROSION, PREVENTION OF OILY GROUND WATER SEEPS FROM CONSUMING WITH SURFACE WATER RUNOFF, AND COLLECTION AND DETENTION OF SURFACE WATER RUNOFF PRIOR TO DISCHARGE OFFSITE, IN ORDER TO REMOVE SETTLEABLE SOLIDS.

SOIL EROSION CONTROLS

ALL THREE ALTERNATIVES WILL INCLUDE MINIMAL REGRADING OF THE BENCHES TO DIRECT SURFACE WATER DRAINAGE TOWARD CHANNELS THAT WILL CONVEY THE RUNOFF TO A SEDIMENTATION BASIN. THE PROPOSED LOCATION OF THE CHANNELS AND BASIN ARE SHOWN ON FIGURE 5. IMPERVIOUS CHANNELS ARE PROPOSED TO MINIMIZE INFILTRATION ON THE BENCHES AND TO PREVENT EROSION OF THE SOUTH ACCESS ROAD. BABIONS WILL BE INSTALLED ON THE STEEP SLOPES BETWEEN THE BENCHES TO PREVENT EROSIONS OF THE SLOPES. RUNON TO THE AREA OF CONTAMINATION WILL BE MINIMIZED BY REGRADING THE AREA ABOVE BENCH 1 SO THAT IT DRAINS TO THE EAST, AROUND THE FIRE AREA.

ALTERNATIVES 3 AND 4 INCLUDE HYDROSEEDING THE CONTAMINATED AREA; ALTERNATIVE 2 DOES NOT. BY ESTABLISHING A VEGETATIVE COVER, SOIL EROSION WILL BE DECREASED BY UP TO 95 PERCENT. THE ASH AND THE HIGH METALS LEVELS PRESENT IN THE SOIL WILL INHIBIT THE GROWTH OF GRASS. IN ORDER TO ESTABLISH GOOD COVER, ONE FOOT OF TOP SOIL MUST BE SPREAD OVER THE AREA PRIOR TO SEEDING. THE ADDITION OF THE TOP SOIL AND HYDROSEEDING WILL MINIMIZE THE SURFACE WATER CONTACT WITH CONTAMINATED SOILS. THIS WILL RESULT IN LOWER LEVELS OF CONTAMINATION REACHING THE SEDIMENTATION BASIN AND LEAVING THE SITE IN THE OVERFLOW.

INCREASE FREEBOARD ON DUTCHMAN'S AND RHINEHART'S PONDS

BERMS WILL BE PLACED AROUND DUTCHMAN'S AND RHINEHART'S PONDS TO PREVENT RUNOFF FROM THE SURROUNDING UNCONTAMINATED AREA FROM ENTERING THE PONDS. INSTEAD, DRAINAGE WILL BE DIRECTED AROUND THE PONDS, DIRECTLY TO MASSEY RUN. KEY POINTS WILL BE RIPRAPPED. THE WATER IN THE TWO PONDS CONTAINS ELEVATED LEVELS OF METALS. THE FREEBOARD PROVIDED BY THE BERMS WILL PREVENT OVERTOPPING AND FURTHER RELEASE OF THE CONTAMINATION TO THE STREAMS LEAVING THE SITE DURING A 20 YEAR STORM.

COLLECTION OF SURFACE WATER RUNOFF, GRAVITY SETTLING

ALTERNATIVES 2,3 AND 4 INCLUDE A SEDIMENTATION BASIN DESIGNED TO DETAIN RUNOFF FROM THE 20-YEAR STORM AND PROVIDE STORAGE FOR FIVE YEARS OF SETTLEABLE SOLIDS. THE EFFECT OF HYDROSEEDING THE RUNOFF COLLECTION AREA IS THE REDUCTION OF THE BASIN SIZE BY 75 PERCENT. THE ROUGH SIZE OF THE BASIN NECESSARY FOR ALTERNATIVE 2 IS 100 FEET BY 235 FEET BY 9 FEET DEEP. ALTERNATIVE 3 AND 4 ONLY REQUIRE A 75 FEET BY 175 FEET BY 6 FEET DEEP BASIN.

THE BASIN WILL BE CONSTRUCTED ACCORDING TO THE REQUIREMENTS CONTAINED IN 40 CFR, PART 264, SUBPART K - SURFACE IMPOUNDMENTS. A TWO-FEET THICK CLAY BASE WILL BE FOLLOWED BY A 30 MIL SYNTHETIC LINER, ONE FOOT OF SAND WITH A LEACHATE COLLECTION SYSTEM AND ANOTHER SYNTHETIC IMPERMEABLE LINER. MONITORING WELLS WILL NOT BE PROVIDED.

COLLECTION OF SHALLOW GROUND WATER OILY SEEPS

TWO INTERCEPTOR TRENCHES ARE PROPOSED TO PREVENT THE OILY SEEPS OBSERVED AT THE SITE FROM JOINING WITH SURFACE WATER RUNOFF. PREVIOUS ANALYSES OF THE OIL HAVE INDICATED HIGH CONCENTRATIONS OF BOTH ORGANIC AND INORGANIC CONTAMINATION. LOCATIONS OF THE PROPOSED INTERCEPTOR TRENCHES ARE INDICATED ON FIGURE B. A COLLECTION AND TREATMENT SYSTEM WAS THEN DESIGNED BASED ON ANTICIPATED MAXIMUM MONTHLY FLOW. IN ALL THREE ALTERNATIVES THE OIL WILL BE SEPARATED FROM THE WATER BY AN API SEPARATOR AND DISPOSED OF AS WASTE OIL.

IN ALTERNATIVES 2 AND 4, DISCHARGE OF THE INTERCEPTED GROUND WATER, FOLLOWING SEPARATION OF THE OIL, WILL BE TO MASSEY RUN. SINCE THE ONSITE SHALLOW GROUND WATER WELLS INDICATE ZINC LEVELS WELL IN EXCESS OF BACKGROUND SURFACE WATER LEVELS, REMOVAL OF METALS IS PROPOSED PRIOR TO DISCHARGE. TRADITIONAL HYDROXIDE PRECIPITATION FOLLOWED BY SULFIDE ADDITION IS ANTICIPATED TO PROVIDE EFFLUENT QUALITY COMPATABLE TO BACKGROUND SURFACE WATER QUALITY. BENCH TOP TREATABILITY STUDIES, EXPLORING THE PROPOSED TREATMENT METHOD AND ONE OR TWO ALTERNATE METHODS, ARE RECOMMENDED PRIOR TO IMPLEMENTATION OF TREATMENT. A BETTER UNDERSTANDING OF THE OILY SEEP MATERIAL WILL BE THE KEY TO DETERMINE THE MOST COST EFFECTIVE/METHOD. IT IS ANTICIPATED THAT SLUDGE GENERATED BY METALS REMOVAL WILL BE DISPOSED IN A SANITARY LANDFILL.

IN ALTERNATIVE 3, FOLLOWING SEPARATION OF THE OIL, INTERCEPTED GROUND WATER WELL BE STORED ONSITE AND TRUCKED TO A PUBLICLY OWNED TREATMENT WORKS (POTW) IN WINCHESTER CITY, VIRGINIA. IT IS EXPECTED THAT THE WATER WILL COMPLY WITH THE POTW INFLUENT STANDARDS WITHOUT ANY TREATMENT OTHER THAN SEPARATION OF THE OIL. MONITORING WILL BE NECESSARY TO ENSURE COMPLIANCE.

ANALYSES OF THE WATER FOLLOWING SEPARATION OF THE OIL SHOULD BE PERFORMED TO DETERMINE WHETHER ANY ADDITIONAL TREATMENT OF THE GROUND WATER WILL BE NECESSARY IN ORDER TO MEET POTW STANDARDS.

DETAILED EVALUATION OF ALTERNATIVES

EACH ALTERNATIVE DESCRIBED IN THE PRECEDING SECTION WILL BE EVALUATED AGAINST SPECIFIC CRITERIA AS FOLLOWS:

1. OVERALL PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT

THE NO ACTION ALTERNATIVE WOULD NOT BE PROTECTIVE BECAUSE CONTAMINANTS IN SURFACE RUNOFF, OILY SEEPS, AND PONDS SEDIMENTS WOULD CONTINUE TO PRESENT AN UNACCEPTABLE RISK TO PUBLIC HEALTH AND THE ENVIRONMENT.

THE REMAINING ALTERNATIVES ARE PROTECTIVE IN THAT EACH PREVENTS THE CONTINUED OFF-SITE MIGRATION OF CONTAMINANTS OF CONCERN.

2. COMPLIANCE WITH APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

THE ARARS CONSIDERED FOR THIS OPERABLE UNIT ARE SOLELY TO PREVENT CONTINUED MIGRATION OF CONTAMINANTS FROM THE SITE. THE ARARS FOR THE ENTIRE WILL BE ADDRESSED IN A SUBSEQUENT OPERABLE UNIT.

ALL ALTERNATIVES, WITH THE EXCEPTION OF THE NO ACTION ALTERNATIVE, WOULD MEET ARARS THAT ARE PERTINENT SPECIFICALLY TO THE MANAGEMENT OF MIGRATION OF CONTAMINATION VIA SURFACE WATER BY PREVENTING THE CONTINUED MIGRATION OF THE CONTAMINANTS OF CONCERN OFF-SITE. THE NO ACTION ALTERNATIVE WOULD NOT ACHIEVE THIS OBJECTIVE, WOULD NOT BE PROTECTIVE, AND THEREFORE, WILL NOT BE CONSIDERED FURTHER. (REFER TO THE ARARS COMPLIANCE MATRIX)

3. LONG-TERM EFFECTIVENESS AND PERMANENCE

EACH OF THE REMAINING THREE ALTERNATIVES WOULD PROVIDE SOME DEGREE OF LONG TERM EFFECTIVENESS BY IMPROVING SURFACE WATER QUALITY AT THE SITE. THE PERMANENCE OF EACH REMEDY WOULD DEPEND ON THE ULTIMATE REMEDY SELECTED FOR THE SITE BUT IN ANY CASE WOULD NOT BE INCONSISTENT WITH THE FINAL REMEDIAL ACTION.

4. REDUCTION OF TOXICITY , MOBILITY, VOLUME

EACH ALTERNATIVE PROVIDES A REDUCTION IN TOXICITY BY REMOVAL OF METALS VIA SETTLING. MOBILITY OF THE CONTAMINANTS INTO THE GROUNDWATER WILL BE REDUCED BY THE INTERCEPTION OF LEACHATE SEEPS. ALTERNATIVE 3 AND 4 EACH ADDITIONAL PROVIDE A GREATER DEGREE OF TREATMENT AND MINIMIZATION OF DIRECT CONTACT TO FURTHER REDUCE TOXICITY.

5. SHORT TERM EFFECTIVENESS

THE REMEDY PROPOSED IN EACH ALTERNATIVE COULD BE ACCOMPLISHED IN 9-12 MONTHS. A SLIGHT INCREASE IN DUST AND EROSION WOULD OCCUR DURING REMEDIATION ACTIVITIES BUT WOULD BE MITIGATED BY APPLICATION OF APPROPRIATE ARARS. THROUGH EFFECTIVE CONTROLS THERE WOULD BE NO SHORT TERM EFFECTS TO THE COMMUNITY OR ON-SITE WORKERS DURING THIS REMEDIATION.

6. IMPLEMENTABILITY

EACH ALTERNATIVE IS READILY IMPLEMENTABLE, ALTHOUGH ALTERNATIVES 2 AND 4 WOULD REQUIRE OBTAINING A LOCAL WASTE WATER TREATMENT PLANT OPERATOR AND WOULD THEREFORE INVOLVE A HIGHER DEGREE OF OPERATOR AND MAINTENANCE REQUIREMENTS. ALTERNATIVE 3, HOWEVER, MAY NEED ADDITIONAL WASTE TREATMENT BEFORE DISCHARGE TO A POTW. GOODS AND SERVICES ARE READILY AVAILABLE FOR ALL ALTERNATIVES EACH OF WHICH INVOLVE STRAIGHT FORWARD CONSTRUCTION PRACTICES.

7. COMMUNITY ACCEPTANCE

A PUBLIC MEETING FOR THE PROPOSED REMEDY WAS HELD ON JUNE 27, 1988 IN WINCHESTER, VIRGINIA. THE MEETING WAS LIGHTLY ATTENDED AND NO QUESTIONS WERE RECEIVED FROM THOSE PRESENT. COMMENTS, HOWEVER, WERE RECEIVED FROM THREE ATTENDEES. THE RESPONSIVENESS SUMMARY ATTACHED TO THIS DECISION SUMMARIZES THE PUBLIC MEETING.

8. STATE ACCEPTANCE

THE STATE OF VIRGINIA HAS RECEIVED THE RI/FS FOR THIS SITE AND CONCURS IN THE SELECTED REMEDY.

9. COST

THE CAPITAL, OPERATION AND MAINTENANCE, AND PRESENT WORTH COSTS FOR EACH ALTERNATIVE ARE SHOWN BELOW:

| COST | ALT. 1 | ALT. 2 | ALT. 3 | ALT. 4 |
|---|---|---|---|---|
| CAPITAL | 0 | 975,500 | 780,400 | 1,165,400 |
| O&M | 13,600 | 70,000 | 145,600 | 71,600 |
| PRESENT WORTH | 55,555 | 1,240,860 | 1,332,340 | 1,436,820 |

SUMMARY

THE NO ACTION ALTERNATIVE IS NOT PROTECTIVE OF HUMAN HEALTH OR THE ENVIRONMENT AND DOES NOT MEET ARARS; THEREFORE, THE NO ACTION ALTERNATIVE WILL NOT BE CONSIDERED FOR THIS SITE.

WITH RESPECT TO THE REMAINING THREE ALTERNATIVES, EACH IS PROTECTIVE AND WILL MEET ARARS FOR THIS SITE. ALTERNATIVE 3 AND 4 PROVIDE A GREATER MEASURE OF REDUCTION OF TOXICITY, AND ALTERNATIVE 3 IS MOST LIKELY EASIER TO IMPLEMENT.

#SR
SELECTED REMEDY

THE REMEDY SELECTED FOR THE FIRST OPERABLE UNIT OF REMEDIATION ST THE WINCHESTER TIRE FIRE SITE IS ALTERNATIVE 3. THIS ALTERNATIVE CONSISTS OF:

- SOIL EROSION CONTROLS
- INCREASED FREEBOARD ON DUTCHMAN'S & RHINEHART'S PONDS
- COLLECTION OF SURFACE WATER RUNOFF, GRAVITY SETTLING
- COLLECTION OF SHALLOW GROUNDWATER SILTY SEEPS, WITH OIL-WATER SEPARATION AND TRANSPORT OF WATER TO POTW.

THIS ACTION WOULD BE AN OPERABLE UNIT MEASURE TO CONTROL CONTAMINANT MIGRATION OFF-SITE BY SURFACE WATER CONTROL. THIS ALTERNATIVE WOULD ALSO NOT BE INCONSISTENT WITH A FINAL REMEDIAL ACTION FOR THIS SITE.

ALTERNATIVE 3 WILL ELIMINATE THE CONTINUED MIGRATION OF INORGANIC CONTAMINANTS, PARTICULARLY ZINC, TO MASSEY RUN (AND ULTIMATELY HOGUE CREEK) FROM SURFACE AND SURFACE SOILS, AND FROM SEDIMENTS IN THE ON-SITE PONDS. SURFACE WATER QUALITY IN THE STREAMS WILL BE IMPROVED THROUGH IMPLEMENTATION OF THE SELECTED REMEDY DIRECT SOIL/ASH CONTACT WILL BE MINIMIZED. THE SELECTED ALTERNATIVE CAN BE OPERATIONAL IN 9-12 MONTHS. SOURCE CONTROL MEASURES WILL NOT BE DIRECTLY ADDRESSED IN THIS OPERABLE UNIT.

THE SELECTED REMEDY MEETS STATUTORY REQUIREMENTS FOR UTILIZING PERMANENT SOLUTIONS AND ALTERNATIVE TREATMENT TECHNOLOGIES FOR THE PRINCIPAL CURRENTLY IDENTIFIED THREAT AT THE SITE AND IS PART OF AN OVERALL LONG-TERM REMEDIATION OF THE SITE, IS NOT INCONSISTENT WITH ANY FINAL REMEDIATION, AND IS PROTECTIVE OF HUMAN HEALTH AND THE ENVIRONMENT.

APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS) PERTAINING TO THIS REMEDY WILL BE ATTAINED. THE ATTACHED ARARS COMPLIANCE MATRIX SHOWS THE ARARS APPLICABLE TO EACH ALTERNATIVE.

THE SELECTED REMEDY ALSO PROVIDES THE BEST BALANCE AMONG THE EVALUATION CRITERIA COST IN COMPARISON WITH THE OTHER ALTERNATIVES. ALTERNATIVE 3 PROVIDES THE GREATEST PROTECTION OF POSSIBLE HEALTH AND THE ENVIRONMENT, WILL BE EASIER TO IMPLEMENT THAN ALTERNATIVES 3 AND 4, AND HAS A COST ABOUT EQUAL TO ALTERNATIVE 2 AND 4.

THIS REMEDY WILL PROVIDE PROTECTION TO HEALTH AND THE ENVIRONMENT AT THIS SITE, NAMELY THE MIGRATION OF CONTAMINATION VIA SURFACE WATERS. IN SO DOING, IT WILL REDUCE THE TOXICITY, MOBILITY, AND VOLUME OF MOST CONTAMINANTS AT THE SITE. COMPLETE CONTAMINANT SOURCE REMEDIATION WILL BE ADDRESSED IN SUBSEQUENT OPERABLE UNIT. THE PREFERENCE FOR TREATMENT TO REDUCE TOXICITY, MOBILITY, AND VOLUME OF THE HAZARDOUS SUBSTANCE WILL BE ADDRESSED IN A SUBSEQUENT OPERABLE UNIT.

#TA
TABLES

TABLE 2
ARARS COMPLIANCE MATRIX

| LOCATION SPECIFIC ARARS | ALT. 1 | ALT. 2 | ALT. 3 | ALT. 4 |
|---|---|---|---|---|
| *ARARS DEALING WITH ARCHEOLOGICAL/HISTORICAL SITES, ENDANGERED SPECIES, FLOOD PLAINS, WETLANDS, | N/A | DISCHARGE OF TREATED WATER TO MASSEY RUN | N/A | SAME AS ALT. 2 |
| SITTING REQUIREMENTS | | | | |
| *VIRGINIA WATER CONTROL BOARD WATER QUALITY STANDARDS | N/A | SAME AS ABOVE | N/A | SAME AS ABOVE |
| ACTION SPECIFIC ARARS | | | | |
| *OSHA STANDARDS | N/A | WORKER PROTECTION | SAME AS ALT. 2 | SAME AS ALT. 2 |
| *VA WATER CONTROL BOARD -STREAM DISCHARGE STANDARDS | N/A | DISCHARGE OF TREATED WATER TO MASSEY RUN | N/A | SAME AS ALT. 2 |
| -PRETREATMENT STANDARDS | N/A | N/A | DISCHARGE TO POTW | N/A |
| -AMBIENT WATER QUALITY CRITERIA | N/A | DISCHARGE TO MASSEY RUN | N/A | DISCHARGE TO MASSEY RUN |
| VA. AIR POLLUTION CONTROL BOARD | | | | |
| -VISIBLE EMISSIONS/ FUGITIVE DUST CONTROL | N/A | CONSTRUCTION OF REMEDY | CONSTR. OF REMEDY | CONSTR. OF REMEDY |
| -SOIL EROSION AND SEDIMENT CONTROL | N/A | SAME AS ABOVE | SAME AS ABOVE | SAME AS ABOVE |
| RCRA REQUIREMENTS 40 CFR 265.222 AND 265.223 (GENERAL OPERATING REQUIREMENTS FOR EXISTING SURFACE IMPOUNDMENTS) | N/A | CONSTRUCTION OF ADDITIONAL FREEBOARD | CONSTR. OF ADD. FREEBOARD | CONSTR. OF ADD. FREE BOARD |

#RS

# RESPONSIVENESS SUMMARY

FROM MAY 31, 1988 TO JUNE 29, 1988, THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) HELD A PUBLIC COMMENT PERIOD ON THE PROPOSED PLAN AND THE REMEDIAL INVESTIGATION/FEASIBILITY STUDY FOR THE RHINEHART TIRE FIRE DUMP IN WINCHESTER, FREDERICK COUNTY, VIRGINIA. THE RI/FS AND OTHER INFORMATION UTILIZED BY EPA TO SELECT A PREFERRED ALTERNATIVE IS INCLUDED IN THE ADMINISTRATIVE RECORD WHICH HAS BEEN AVAILABLE TO THE PUBLIC SINCE THE BEGINNING OF THE PUBLIC COMMENT PERIOD. IN ADDITION, COPIES OF THE PROPOSED PLAN WERE DISTRIBUTED AT THE PUBLIC MEETING HELD ON JUNE 27, 1988.

## SUMMARY OF PUBLIC MEETING AND MAJOR COMMENTS

THE PUBLIC MEETING WAS HELD IN WINCHESTER, VIRGINIA ON JUNE 27, 1988. THOSE ATTENDING THE MEETING INCLUDED REPRESENTATIVES FROM EPA, THE STATE OF VIRGINIA, THE ARMY CORPS OF ENGINEERS, AREA NEWS REPORTERS, AND 2 COMMUNITY RESIDENTS. THE EPA REPRESENTATIVES WERE MR. ANTHONY DAPPOLONE, MR. WILLIAM HAGEL, AND MR. HAROLD YATES. THE VIRGINIA REPRESENTATIVE WAS MR. JAMES ADAMS.

DURING THE PUBLIC MEETING THE PROPOSED OPERABLE UNIT REMEDY FOR THE RHINEHART TIRE FIRE SITE WAS DESCRIBED BY MR. DAPPOLONE AND AN EXPLANATION FOR SELECTION OF THE PREVENTION OF MIGRATION OF CONTAMINANTS OFFSITE IS THE EPA PREFERRED ALTERNATIVE. AFTER THE PRESENTATION, THE FLOOR WAS OPENED FOR COMMENTS AND QUESTIONS.

NO QUESTIONS WERE RECEIVED FROM THE AUDIENCE. THREE PEOPLE, HOWEVER, GAVE A BRIEF STATEMENT CONCERNING THE REMEDY.

MR. JOHN REILLY, THE COUNTY ADMINISTRATOR, EXPRESSED HIS BELIEF THAT THE MAJORITY OF CONTAMINANTS LEAVING THE RHINEHART SITE ORIGINATE FROM THE ONSITE DUTCHMANS POND. HE ALSO STATED THAT HE BELIEVED THAT NATURAL DRAINAGE SHOULD BE LOOKED AT IN THE REMEDY PROCESS INSTEAD OF CONSTRUCTION OF CONCRETE CHANNELS. FINALLY, HE RECOMMENDED THAT THE VIRGINIA STATE WATER CONTROL BOARD REVIEW THE FINDINGS OF STREAM INVESTIGATIONS AT THE SITE.

MR KENNETH STILES, CHAIRMAN OF THE BOARD OF SUPERVISORS FOR FREDERICK COUNTY, GAVE HIS SUPPORT TO MR. REILLY'S STATEMENTS AND ADDED THAT HIS BASIC CONCERN WAS THAT A LARGE AMOUNT OF MONEY WAS SPENT IN INVESTIGATING THE SITE.

MR ROBER RHOADS, A LOCAL CITIZEN, EXPRESSED SOME CONCERNS FOR THE CLEANUP LEVELS AS STATED IN THE ENDANGERMENT ASSESSMENT FOR THE SITE.

MR. REILLY'S COMMENTS WILL BE CONSIDERED IN THE DESIGN PHASE OF THIS PROJECT. IN RESPONSE TO MR. STILES, EPA CONSIDERS VARIOUS ALTERNATIVE ACTIONS FOR REMEDIAL INVESTIGATIONS; HOWEVER, HAZARDOUS WASTE CLEANUPS ARE, BY THEIR NATURE, EXPENSIVE PROJECTS. WITH RESPECT TO MR. RHOADS, HIS COMMENTS DID NOT CONSIDER EPA'S POLICIES AND OBJECTIVES AND THEREFORE CANNOT BE CONSIDERED TO AFFECT THE REMEDY.